

SMALL CLAIMS COMPLAINT (Contract, Security Deposit, Rent, or Tort)

NOTICE: This is a public document, which means the document as submitted will be available to the public upon request. Therefore, do not enter personal identifiers on it, such as Social Security number, driver's license number, vehicle plate number, insurance policy number, active financial account number, or active credit card number.

Plaintiff or Filing Attorney Information:

Name _____
 NJ Attorney ID Number _____
 Address _____
 Telephone Number _____ ext. _____

RECEIVED & FILED**JAN 23 2018****SUPERIOR COURT OF NJ
GLO. COUNTY CIVIL PART****Superior Court of New Jersey****Law Division, Special Civil Part****Small Claims Section**Gloucester CountyDocket No: SC-67-18
(to be provided by the court)**Civil Action****Complaint****From Plaintiff**

Name KATHY L. HINES
 Address 35 B Aspen Hill
Deptford, New Jersey 08096
 Telephone Number 856-579-4498 ext. _____

To Defendant

Name Bruce K. Warren Esq.
 Address 591 Mantua Blvd
Mantua, New Jersey
 Telephone Number 856-848 ext. 08051
4572

Check One:

- ☒ Contract
☐ Security Deposit
☐ Rent
☐ Personal Injury or Property Damage (other than motor vehicle)

COMPLAINT

Demand: \$ 2075.00 plus costs. Type or print the reasons you, the Plaintiff(s), are suing the Defendant(s):
 Attach additional sheets if necessary.

Please see typed copy
attached. (KA)

Breach of Contract

IMPORTANT: Plaintiffs and defendants must bring all witnesses, photos, and documents, and other evidence to the hearing. Subpoena forms are available at the Clerk's office to require the attendance of witnesses.

At the trial Plaintiff will require:

An interpreter

☐ Yes☒ No

Indicate Language _____

An accommodation for disability

☐ Yes☒ No

Indicate Disability _____

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

1-19-2018
 Date

Kathy L. Hines
 Plaintiff's Signature

KATHY L. HINES
 Plaintiff's Name Typed, Stamped or Printed

RECEIVED & FILED

JAN 23 2018

SUPERIOR COURT OF NEW JERSEY
GLD COUNTY CIVIL PART

Superior Court of New Jersey
Law Division, Special Civil Part
Small Claims Section
Gloucester County
Courtroom 101
1000 Washington Blvd.
Lodi, NJ 08042

Civil Action
Complainant

☒ Personal Injury or Property Damage (other than motor vehicle)
☐ Real
☐ Business/Professional
☐ Other

COMPLAINANT

Plaintiff's Name: John J. Smith
Address: 123 Main St.
City: Paterson, NJ
State: NJ Zip: 07654
Telephone: 201-123-4567

IMPORTANT: Plaintiff and defendant must bring all witnesses, photos, and documents, and other evidence to the hearing. Depositions taken in a deposition at the Clerk's office to request the attendance of witnesses.

At the time of filing, I will request:
An interpreter ☐ Yes ☒ No
An accommodation for disability ☐ Yes ☒ No

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.
I certify that all documents and evidence have been reviewed and that the documents are true and correct to the best of my knowledge and belief.

Signature of Plaintiff: John J. Smith
Date: 1-19-2018
Signature of Defendant: [Signature]
Date: 1-19-2018

While I resided at 209 Barlow Avenue Cherry Hill, New Jersey 08002

On May 11th 2017 at 2pm I was seen at Bruce Warrens Law office at 591 Mantua Blvd in Mantua for a consultation regarding my case visitation and custody for my son Brandon. As I was told by Camden Superior Court to come back with attorney.

Mr. warren was obtained through information given to me by my attorney Scott Schweiger who was retained for the Renewal of my RN License.

Upon consultation Mr. Warren told me he would be glad to take my case and that his strategy would be "psychological parent". He stated this at the consultation. May 11th 2017.

Mr. Warren was paid \$2,500 retainer on May 11th 2017 copy of receipt provided. Bonnie called and requested paper work of my appeal which I dropped off at 11 am May 16th 2017. I did not hear from him again untill after I moved in August 2017. new residence 35B Aspen Hill, Deptford, New Jersey 08096. At which time I called and emailed his reception Bonnie. .

Spoke with Bonnie and I was told that Bruce had completed paperwork to present for my case and I was to come in to review final presentation and to sign it so it could be filed for a court date.

Appointment given August 25th at 1:00. by Bonnie. Bonnie called that morning to cancel that appointment stating Bruce is fine tuning completed document for my review and he was not quite finished.

Re-scheduled for August 28th at 5:00pm. Bonnie called that morning and asked for me to come in at 3 pm to review completed paperwork and for me to sign.

I was told 3 times that the reason for this appointment was for me to review completed paperwork and then sign for it to be submitted and receive court date.

At 3pm when I arrived no paperwork was there to review no paperwork was filled out. . No completed case to present on my behalf to the court ..

Instead Bonnie handed me a motion packet and asked me to fill it out. I then had to state NO I was told by you to come in review completed paperwork that was to be filled on my behalf that is what You were hired for and what you told me I was to come in for.

That was not the case. I was upset and refused to fill out motion packet. I waited 30 minutes for Mr. Warren to arrive.

They had been paid May 11th 2017 and now it is August 28th 2017. Nothing had been done. Like I was told After all this time. He then got angry and told me to leave.

While I resided at 309 Badow Avenue, Jersey Hill, New Jersey 08093.

On May 11th 2017 at 1pm I was seen at Bruce Warren's law office at 591 Mantua Blvd in Mantua for a consultation regarding my case. I was told that I should bring my son Brandon. As I was told by Camden Superior Court to come back with attorney.

Mr. Warren was obtained through information given to me by my attorney Scott Schweiger who was retained for the Renewal of my RPL rights.

Upon consultation Mr. Warren told me he would be glad to take my case and that his lawyer would be "psychological parent". He stated this at the consultation, May 11th 2017.

Mr. Warren was paid \$2,500 retainer on May 11th 2017 copy of receipt provided. Bonnie called and requested paper work of my appeal which I dropped on at 11 am May 11th 2017. I did not hear from him again until after I moved to August 2017 new residence, 359 Aspen Hill, DeFord, New Jersey 08096. At which time I called and mailed his reception Bonnie.

Spoke with Bonnie and I was told that Bruce had completed paperwork to present for my case and I was to come in to review that presentation and to sign it so it could be filed for a court date.

Appointment given August 25th at 1:00 by Bonnie. Bonnie called that morning to cancel that appointment stating Bruce is the judge completed document for my review and he was not notified.

Re scheduled for August 28th at 1:00pm. Bonnie called that morning and asked for me to come in at 3 pm to review completed paperwork and for me to sign.

I was told I think that the reason for this appointment was for me to review completed paperwork and then sign for it to be submitted and receive court date.

At 3pm when I arrived no paperwork was there to review no paperwork was filled out. No completed case to be sent on my behalf to the court.

Instead Bonnie handed me a motion packet and asked me to fill it out. I then had to state NO I was told by you to come in review completed paperwork that was to be filled on my behalf that is what you were hired for and what you told me I was to come in for.

That was not the case, I was upset and refused to fill out motion packet. I waited 30 minutes for Mr. Warren to arrive.

They had been paid May 11th 2017 and now it is August 28th 2017. Nothing had been done. Like I was told after all this time. He then got angry and told me to leave.

He proceeded to write out a check for 2,500 gave me the check and the paperwork and I left.

I deposited the check in my bank. He knowingly wrote me a check that he then bounced.

He then wrote a letter to me and gave me a check in the amount of \$425.00. which included a file for reimbursement.

The check for 2,500 bounced and I was charged \$15.00.

Nothing was ever filled out for me to review or sign as i was told repeatedly that was the reason for our appointment.

Contract was not carried out filled out as I was told.. Nothing ever was done. No paperwork. Nothing.

I am asking for the return of my entire check issued to Mr. Warren .

I still have to hire an attorney. Why would I hire an attorney that would not do what they say they were going to do.

If paperwork had been completed like I was told ,I would have reviewed, signed and a courtdate would have then been filed.

He proceeded to write out a check for \$250.00, and the paperwork and I left.

I deposited the check in my bank. He told me that the check had been bounced.

He then wrote a letter to me and gave me a check for \$250.00, which included a

file for reimbursement.

The check for \$250.00 bounced and I was charged \$15.00.

Nothing was ever filled out for me. I was told repeatedly that was the reason

for our reimbursement.

Consequently, I was not called out and I was told that nothing was done. The paperwork

Nothing.

I am asking for the return of my entire check and to Mr. T. Brown.

I still have to hire an attorney. Why would I hire an attorney that would not do what they say

they were going to do.

If paperwork had been completed like I was told, I would have reviewed, signed and a

certificate would have been filed.

Law Offices of Scott T. Schweiger

35 Kings Highway East
Suite 200
Haddonfield, New Jersey 08033

PH: (856) 354-2002
FAX: (856) 354-2003

Email: scott.schweiger@comcast.net

May 3, 2017

Kathy Hines
209 Barlow Avenue
Cherry Hill, NJ 08002

Re: Your Nursing License Reinstatement

Dear Kathy:

Please allow this correspondence to serve as a follow up to our meeting of yesterday, May 2, 2017.

First, I believe that you are aware that I will not be pursuing any issues on your behalf except for the pursuit of the reinstatement of your nursing license. Over the past several months, you have repeatedly questioned me and sought advice and/or my services regarding making an application to the court to pursue rights associated with your son. Prior to yesterday, I was of the belief that you still thought that I would assist you in this regard. During our meeting, I now believe that you understand that I will not assist you in this regard. Accordingly, I am simply confirming that I am not getting involved in that matter.

Fortunately, I was able to reach out to a colleague who advised me to give you his contact information. His name is Bruce Warren, Esquire and his phone number is 856-848-4572. I am still trying to find other options but so far, he is the only one who has even remotely expressed an interest in discussing the matter. If anyone else is interested, I will immediately provide you with their information.

However, by providing Mr. Warren's information to you, I need to confirm that this does not mean that he is going to handle the matter on your behalf. It simply means that he is willing to consult with you to see if there is anything he feels that he can do to help. Further, I have absolutely nothing to do with his decision to either take the case or to deny representation. I also have absolutely nothing to do with how he runs his practice, including his billing, and whether or not he will require a consultation fee. In order to ensure an accurate assessment of the matter, I encourage you to provide him with as much information as possible regarding the most recent orders and the appeal of the termination of your parental rights.

5/11/2017

Law Office of David T. Schweitzer

11 Lombard Street, Suite 200

San Francisco, CA 94133

May 2, 2017

Kathy Jones
209 Lincoln Avenue
Berkeley, CA 94702

Re: Your Nursing License Reinstatement

Dear Kathy:

Please allow this correspondence to serve as a follow-up to our meeting of yesterday, May 2, 2017.

First, I believe that you are aware that I will not be pursuing any issues on your behalf except for the reinstatement of your nursing license. Over the past several months, you have repeatedly contacted me and sought advice regarding my services regarding handling an application to the court to pursue rights as described in your form. However, yesterday, I was of the belief that you felt I would assist you in this regard. During our meeting, I now believe that you understood that I will not assist you in this regard. Accordingly, I am simply confirming that I am not getting involved in that matter.

Second, I am not willing to get involved in any matter to give you the contact information. His name is Brian W. Jones, and his phone number is 850-818-1572. I am willing to find other options for you, but I do not want to be involved in this matter. I am not interested in discussing the matter. If you are interested, I will immediately provide you with that information.

However, by providing Mr. W. Jones' information to you, I need to confirm that this does not mean that he is going to handle the matter on your behalf. It simply means that he is willing to consult with you to see if there is anything he feels that he can do for you. I have absolutely nothing to do with this. I am not either taking the case or doing representation. I also have absolutely nothing to do with how he runs his practice, including his billing, and whether or not he will provide a consultation for the matter. I am not an accurate assessment of the matter. I cannot say to provide him with accurate information as possible regarding the most recent work and the status of the reinstatement of your nursing license.

RECEIPT		DATE <u>5-11-17</u>	No. <u>850977</u>
RECEIVED FROM <u>Kathy Hives</u>		<u>\$2500.00</u>	
<input type="checkbox"/> FOR RENT		DOLLARS	
<input type="checkbox"/> FOR <u>Retainer - legal fees</u>			
ACCOUNT	<input type="checkbox"/> CASH	FROM	TO
PAYMENT	<input checked="" type="checkbox"/> CHECK	<u>B. Davis</u>	
BAL DUE	<input type="checkbox"/> MONEY ORDER		
	<input type="checkbox"/> CREDIT CARD	BY	

3-11



WLG
WARREN LAW GROUP, LLC

Bruce K. Warren, Esq.
Licensed in NJ, NY & PA

S. Alyssa Johnston, Esq.
Licensed in PA & NJ

May 11, 2017

Kathy L. Hines

In re: Custody Issues

Dear Kathy:


It was a pleasure meeting you. Per our conference, I have agreed to represent you with regard to your custody matter.

At this time, I want to thank you for selecting my law firm to represent you in this matter. I also wish to set forth our agreement as to payment of my fees. My fee for legal services in this matter shall be billed at a rate of \$250.00 per hour, plus any actual costs. We do require a retainer of \$2,500.00.

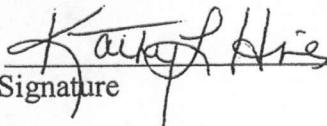
On behalf of the firm, we are happy to represent you in this matter. If you have any questions, please contact me at your convenience.

Very truly yours,

Bruce K. Warren, Esq.



I have read this letter and consent to it. Furthermore, I grant and give my informed consent after Bruce K. Warren, Esq. has proposed the course of conduct, has communicated adequate information, and has explained all material risks of and reasonable available alternatives to the proposed course of conduct. A facsimile or electronically copied/scanned signature of this document shall have the same force and effect as the original.



Signature

Print name: Kathy L. Hines

Date: 5-11-2017

WARREN LAW GROUP, LLC

Bruce K. Warren, Esq.
Licensed in PA & NJ

Bruce K. Warren, Esq.
Licensed in NJ, NY & PA

May 11, 2017

Kathy L. Hines

In re: Custody Issues

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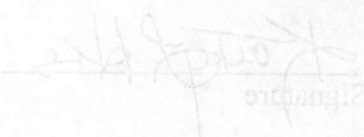
On behalf of the firm, we are happy to represent you in this matter. If you have any questions, please contact me at your convenience.

Very truly yours,

Bruce K. Warren, Esq.



I have read this letter and consent to it. Furthermore, I grant and give my informed consent after Bruce K. Warren, Esq. has proposed the course of conduct, has communicated adequate information, and has explained all material risks of and reasonable available alternatives to the proposed course of conduct. A facsimile or electronically copied scanned signature of this document shall have the same force and effect as the original.


Signature

Print name: Kathy L. Hines

Date: 5-11-2017